

Vikram Valame

4039 2<sup>nd</sup> Street Palo Alto, California 94306

(208) 994 3067

vik.valame@gmail.com

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

Vikram Valame

Plaintiff,

vs.

Joseph R. Biden, President of the United  
States, et. al.

Defendants.

) Case Number: 5:23-cv-03018-NC

) **SUPPLEMENTAL DECLARATION OF**  
) **VIKRAM VALAME**

) **IN SUPPORT OF PLAINTIFF'S MOTION**  
) **FOR A TRO**

I, *Vikram Valame* declare as follows:

1. I am the *pro se* plaintiff in this lawsuit against the United States Federal Government and its officials.

2. I have personal knowledge of all facts stated in this declaration, and if called to testify, I could and would testify competently thereto.

3. I have knowingly and willfully refused to register for the draft despite the purported registration requirement contained in the Military Selective Service Act and its

2<sup>nd</sup> Supplemental DECLARATION of Vikram Valame IN SUPPORT OF Plaintiff's Motion for a TRO

1 implementing regulations. I will not obey the registration obligation in the future unless a court  
2 finally finds that I am obligated to.

3 4. In early December, the Nuclear Regulatory Commission contacted me to conduct  
4 a panel interview for my internship application. I conducted the interview shortly before leaving  
5 for Germany. The interview went well, and a few days later the NRC contacted me and asked for  
6 two U.S. Citizen references, which I provided.

7 5. On January 11<sup>th</sup>, 2024, Debby Hackett from the NRC contacted me and informed  
8 me that I had been tentatively selected for the NRC internship in the Office of Administration's  
9 Acquisition Management Division. Hackett informed me that after I filled out the OF-306  
10 declaration for federal employment and completed some other paperwork, I would receive a final  
11 offer.

12 6. I can provide a copy of this email correspondence if requested. I have already  
13 provided a copy to the government's lawyers.

14 7. The OF-306 document required me to disclose my registration status with the  
15 Selective Service under penalty of perjury.

16 8. I clicked "no" for registration, and then filled out a box asking for an explanation.  
17 I explained that the MSSA was unconstitutional, and that I was therefore not required to register.  
18 I then filled out the rest of the form by clicking "no" on several criminal background questions  
19 and signing it electronically.  
20

21 9. On January 18, 2024, Debby Hackett contacted me and told me that that the  
22 NRC's policy prohibited me from gaining employment absent draft registration. Hackett said  
23 that if I did not resubmit the OF-306 with a "yes" to registration status my offer would be  
24 revoked.

25 10. Hackett included the following policy in her email: "A male born after December  
26 31, 1959, who was or is required to register under section 3 of the Military Selective Service Act,  
27 and who is not so registered or knowingly and willfully did not so register before the requirement  
28 terminated or became inapplicable to him, is not eligible for employment with the NRC"

2<sup>nd</sup> Supplemental DECLARATION of Vikram Valame IN SUPPORT OF Plaintiff's Motion for  
a TRO

1 11. I provided email notice to Defendants counsel that I would file an application for  
2 a TRO in response to this unlawful discrimination. Defendants' counsel acknowledged my  
3 notice.

4 12. I am now even more anxious and frustrated about my position in society and my  
5 future career prospects. Following the internship offer, I had discussed acquiring  
6 accommodations in Washington D.C., arranged a means of making initial payments for housing  
7 at Georgetown University, and made plans to visit the Supreme Court in late June for its opinion  
8 announcements from the bench. The government has forced me to put these plans on hold.

9  
10 I declare under penalty of perjury under the laws of the United States of America that the  
11 foregoing is true and correct, and that this declaration was executed on January 19<sup>th</sup>, 2023.

12  
13 Signature: 

14 Printed name: Vikram Valame

15 Address: 4039 2<sup>nd</sup> Street Palo Alto, California 94306

16 Phone Number: (208) 994 3067  
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